IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

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                                                   :    Chapter 9
In re                                              :
                                                   :    Case No. 13-53846
CITY OF DETROIT, MICHIGAN,                         :
                                                   :    Hon. Steven W. Rhodes
                               Debtor              :
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STIPULATION FOR WITHDRAWAL OF
SATISFIED CLAIM OF INLAND WATERS POLLUTION CONTROL

Inland Waters Pollution Control ("Inland Waters") and the City of Detroit, Michigan (the "City"), by and through their undersigned counsel, stipulate as follows in support of the entry of the *Order Withdrawing Satisfied Claim of Inland Waters Pollution Control* attached hereto as **Exhibit 1.**

1.   On February 12, 2014, Inland Waters filed its proof of claim [Claim No. 879] (the "Claim") in the amount of $5,281,099.

2.   The Claim alleged a $1,999,979 secured claim and the remainder, $3,281,120, as a general unsecured claim.

3.   In the ordinary course of its business, the City has paid Inland Waters all of the amounts sought in the Claim.

4.   Inland Waters hereby withdraws the Claim in its entirety because the Claim has been fully satisfied.

4.   Nothing in this Stipulation or the proposed order attached hereto as Exhibit 1 addresses any post-petition claims which have arisen or may arise between the City and Inland

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Waters. Both parties fully reserve all of their respective rights with respect to any post-petition claims.

WHEREFORE the parties respectfully request that the Court enter an order in the form attached hereto as **Exhibit 1** withdrawing the Claim.

Respectfully submitted by:

JAFFE RAITT HEUER & WEISS, PC	**FOLEY & LARDNER, LLP**
By: /s/ Paul R. Hage Paul R. Hage 27777 Franklin, Ste. 2500 Southfield, MI 48034 Phone: (248) 351-3000 Phage@jaffelaw.com *Counsel to Inland Waters Pollution Control*	By: /s/ Jeffrey S. Kopp Jeffrey S. Kopp (P59485) John A. Simon (P61866) Tamar N. Dolcourt (P73425) 500 Woodward Ave., Ste. 2700 Detroit, MI 48226 Phone: (313) 234-7100 jkopp@foley.com jsimon@foley.com tdolcourt@foley.com *Counsel to the City of Detroit, Michigan*

Dated: January 14, 2015

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